

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al §
Plaintiffs, §
§
v. § Case No.: 1:21-CV-0786-XR,
§ consolidated with 5:21-CV-0844-XR
GREGORY W ABBOTT, et al, §
Defendants. §
§
§

**ORIGINAL ANSWER OF DEFENDANT ISABEL LONGORIA, IN HER OFFICIAL
CAPACITY AS THE HARRIS COUNTY ELECTIONS ADMINISTRATOR**

Defendant ISABEL LONGORIA, in her official capacity as the Harris County Elections Administrator (“Defendant” or “Defendant Longoria”) now files her Original Answer to Plaintiffs LULAC Texas, VOTO Latino, Texas Alliance for Retired Americans, and Texas AFT’s (“Plaintiffs) Original Complaint (“Complaint”) and would respectfully show this Court as follows. Each numbered response corresponds with the same numbered paragraph in the Complaint.

1. Defendant admits the allegations in this paragraph.
2. Defendant admits that Texans encountered unprecedented challenges while attempting to vote in the midst of a global health crisis and that the Attorney General threatened to prosecute people for actions related to voting. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph
3. Defendant admits the allegations in this paragraph.
4. Defendant admits the allegations in this paragraph.
5. Defendant admits the allegations in this paragraph.
6. Defendant admits the allegations in this paragraph.

7. Defendant admits the allegations in this paragraph.

8. Defendant admits the allegations in this paragraph.

9. Defendant admits the allegations in this paragraph.

10. Defendant admits that the Texas Legislature enacted S.B.1 in a controversial second special session. Defendant admits that S.B.1 imposes additional restrictions and burdens voters and voters of color in particular. Defendant also admits that S.B.1 is unconstitutional. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

11. Defendant admits that S.B. 1 was not enacted to preserve election integrity or combat election fraud. Defendant admits that the state's own election officials have acknowledged that elections in Texas are already secure. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

12. Defendant admits that S.B. 1 imposes significant barriers to voters of color and discriminates against voters of color in violation of the First and Fourteenth Amendments of the United States Constitution and the Voting Rights Act. Defendant admits that Texas has a long history of discrimination against voters of color. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

13. Defendant admits that Plaintiffs bring this lawsuit for the reasons listed in this paragraph.

14. Defendant admits the allegations in this paragraph.
15. Defendant admits the allegations in this paragraph.
16. Defendant admits the allegations in this paragraph.
17. Defendant admits the allegations in this paragraph.

18. Defendant admits the allegations in this paragraph.
19. Defendant admits the allegations in this paragraph.
20. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
21. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
22. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
23. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
24. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
25. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.
26. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
27. Defendant admits the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
28. Defendant admits the allegations in this paragraph.
29. Defendant admits the allegations in this paragraph.
30. Defendant admits the allegations in this paragraph.
31. Defendant admits the allegations in this paragraph.

32. Defendant admits the allegations in this paragraph.
33. Defendant admits the allegations in this paragraph.
34. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.
35. Defendant admits the allegations in this paragraph.
36. Defendant admits the allegations in this paragraph.
37. Defendant admits the allegations in this paragraph.
38. Defendant admits the allegations in this paragraph.
39. Defendant admits the allegations in this paragraph.
40. Defendant admits the allegations in this paragraph.
41. Defendant admits the allegations in this paragraph.
42. Defendant admits the allegations in this paragraph.
43. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.
44. Defendant lacks knowledge or information sufficient to respond to the allegations in this paragraph.
45. Defendant admits the allegations in this paragraph.
46. Defendant admits the allegations in this paragraph.
47. Defendant admits the allegations in this paragraph.
48. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

49. Defendant admits that Harris County's efforts to ensure access to the ballot box during the height of the pandemic were successful. Defendant admits that some polling places in Harris County stayed open past 7:00 PM for one day. Defendant denies all other allegations in this paragraph.

50. Defendant admits the allegations in this paragraph.

51. Defendant admits the allegations in this paragraph.

52. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

53. Defendant admits the allegations in this paragraph.

54. Defendant admits the allegations in this paragraph.

55. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

56. Defendant admits that ballot drop boxes are secure receptables where absentee ballots can be delivered by voters to an election worker before Election Day. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

57. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

58. Defendant admits the allegations in the first and second sentences of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

59. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

60. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

61. Defendant admits the allegations in this paragraph.

62. Defendant admits the allegations in this paragraph.

63. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

64. Defendant admits that Harris County planned to have twelve drop boxes but ultimately had only one drop box for millions of registered voters because of Governor Abbott's proclamation that limited the use of absentee ballot boxes to just one drop box location per county.

65. Defendant admits the allegations in this paragraph.

66. Defendant admits that at least one lawsuit sought to invalidate ballots that had already been cast.

67. Defendant admits the allegations in this paragraph.

68. Defendant admits the allegations in this paragraph.

69. Defendant admits the allegations in this paragraph.

70. Defendant admits the allegations in this paragraph.

71. Defendant admits the allegations in this paragraph.

72. Defendant admits the allegations in this paragraph.

73. Defendant admits the allegations in this paragraph.

74. Defendant admits the allegations in this paragraph.

75. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

76. Defendant admits the allegations in this paragraph.

77. Defendant admits the allegations in this paragraph.

78. Defendant admits the allegations in this paragraph.

79. Defendant admits the allegations in this paragraph.

80. Defendant admits the allegations in this paragraph.

81. Defendant admits the allegations in this paragraph.

82. Defendant admits that the Supreme Court ruling was clear. Defendant admits that some Republican officials continued to try to disenfranchise voters in other jurisdictions.

83. Defendant admits the allegations in this paragraph.

84. Defendant admits the allegations in this paragraph.

85. Defendant admits the allegations in this paragraph.

86. Defendant admits the allegations in this paragraph.

87. Defendant admits the allegations in this paragraph.

88. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

89. Defendant admits the allegations in this paragraph.

90. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

91. Defendant admits the allegations in this paragraph.

92. Defendant admits the allegations in this paragraph.

93. Defendant admits the allegations in this paragraph.

94. Defendant admits that S.B.7 ultimately passed the Senate and was sent to the House for consideration.

95. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

96. Defendant admits the allegations in this paragraph.

97. Defendant admits the allegations in this paragraph.

98. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

99. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

100. Defendant admits the allegations in this paragraph.

101. Defendant admits the allegations in this paragraph.

102. Defendant admits the allegations in this paragraph.

103. Defendant admits the allegations in this paragraph.

104. Defendant admits the allegations in this paragraph.

105. Defendant admits that H.B. 6 stalled in committee. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

106. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

107. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

108. Defendant admits that S.B. 7 passed out of the Elections Committee along party lines. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

109. Defendant admits the allegations in this paragraph.

110. Defendant admits the allegations in this paragraph.

111. Defendant admits that, within a week, S.B. 7 was brought to the House floor for debate. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

112. Defendant admits the first and second sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

113. Defendant admits the allegations in this paragraph.

114. Defendant admits the allegations in this paragraph.

115. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

116. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

117. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

118. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

119. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

120. Defendant admits the allegations in this paragraph.

121. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

122. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

123. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

124. Defendant admits the allegations in this paragraph.

125. Defendant admits the allegations in this paragraph.

126. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

127. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

128. Defendant admits the allegations in this paragraph.

129. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

130. Defendant admits the allegations in this paragraph.

131. Defendant admits the allegations in this paragraph.

132. Defendant admits the allegations in this paragraph.

133. Defendant admits that numerous people had to wait until past midnight to testify in opposition to S.B.1. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

134. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

135. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

136. Defendant admits the allegations in this paragraph.

137. Defendant admits the allegations in this paragraph.

138. Defendant admits the allegations in this paragraph.

139. Defendant admits the allegations in this paragraph.

140. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

141. Defendant admits the allegations in this paragraph.

142. Defendant admits that some House Democrats left Texas to deny the House the quorum it needed to enact new bills. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

143. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

144. Defendant admits that the first special session ended without a quorum in the House and that Governor Abbott immediately called a second special session. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

145. Defendant admits that S.B. 1 passed out of the Senate committee along a party-line vote. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

146. Defendant admits that Senator Carol Alvarado took to the Senate floor to filibuster S.B. 1. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

147. Defendant admits the allegations in this paragraph.

148. Defendant admits the allegations in this paragraph.

149. Defendant admits that a committee hearing on S.B.1 was scheduled three days into the session and that S.B.1 passed out of committee along party lines. Defendant admits that S.B.1 was placed on the floor for a vote the next day when the full House was in session. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

150. Defendant admits the allegations in this paragraph.

151. Defendant admits the allegations in this paragraph.

152. Defendant admits the allegations in this paragraph.

153. Defendant admits the allegations in this paragraph.

154. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

155. Defendant admits the allegations in this paragraph.

156. Defendant admits the allegations in this paragraph.

157. Defendant admits the allegations in this paragraph.

158. Defendant admits the allegations in the first sentence of this paragraph.

Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

159. Defendant admits that Harris County is home to the State's largest minority population. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

160. Defendant admits that before dropping off a ballot in person, voters were already required to present identification to an election official. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

161. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

162. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial.

163. Defendant admits the allegations in this paragraph.

164. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in the first sentence of this paragraph. The allegations in the second sentence of this paragraph consist of legal conclusions that are not subject to admission or denial.

165. Defendant admits the allegations in this paragraph.

166. Defendant admits the allegations in this paragraph.

167. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

168. Defendant admits the allegations in this paragraph.

169. Defendant admits that S.B. 1 imposes vague prohibitions against receiving "compensation or other benefit" in exchange for certain interactions and threatens criminal

penalties for so-called “vote harvesting.” Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

170. Defendant admits that the criminal prohibitions in S.B. 1 suppress a wide range of completely legitimate and commonplace activities. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

171. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

172. Defendant admits the allegations in this paragraph.

173. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

174. Defendant admits the allegations in this paragraph.

175. Defendant admits the allegations in this paragraph.

176. Defendant admits that 10,250 voters participated in the 24-hour voting program.

Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

177. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

178. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

179. Defendant admits the allegations in this paragraph.

180. Defendant admits the allegations in this paragraph.

181. Defendant admits the allegations in this paragraph.

182. Defendant admits the allegations in this paragraph.

183. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

184. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

185. Defendant admits the allegations in this paragraph.

186. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

187. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

188. Defendant admits the allegations in this paragraph.

189. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

190. Defendant admits the allegations in this paragraph.

191. Defendant admits the allegations in this paragraph.

192. Defendant admits that numerous political actors have tried and failed to come up with evidence of widespread voter fraud. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

193. Defendant admits the allegations in this paragraph.

194. Defendant admits the allegations in this paragraph.

195. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

196. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

197. Defendant admits the allegations in this paragraph.

198. Defendant admits the allegations in this paragraph.

199. Defendant admits that S.B. 1 will serve to deter service-minded Texans from volunteering as election workers and create myriad new restrictions that will burden the right to vote for the State's lawful voters. Defendant admits that there is no evidence of widespread fraud in Texas elections.

200. Defendant agrees that officials of the State of Texas have been attempting to limit Black and Latino political participation for centuries and that S.B. 1 is the last manifestation of those efforts.

201. Defendant admits the allegations in this paragraph.

202. Defendant admits the allegations in this paragraph.

203. Defendant admits the first and second sentence of this paragraph. Defendant lacks knowledge or information sufficient to respond to the remaining allegations in this paragraph.

204. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

205. Defendant admits the allegations in this paragraph.

206. Defendant admits the allegations in this paragraph.

207. Defendant admits the allegations in the first and second sentences of this paragraph.

Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

208. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

209. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

210. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

211. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

212. Defendant admits the allegations in this paragraph.

213. Defendant admits the allegations in this paragraph.

214. Defendant admits the allegations in this paragraph.

215. Defendant admits that 72 percent of the prosecutions brought by The Texas Attorney General's Election Integrity Unit since 2015 have been against Black and Hispanic individuals. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

216. Defendant admits the allegations in this paragraph.

217. Defendant admits the allegations in this paragraph.

218. Defendant admits the allegations in this paragraph.

219. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

220. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

221. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

222. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

223. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

224. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

225. Defendant admits the allegations in this paragraph.

226. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

227. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

228. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

229. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

230. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

231. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

232. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

233. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

234. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

235. Defendant admits the allegations in this paragraph.

236. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

237. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

238. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

239. Defendant admits the allegations in this paragraph.

240. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

241. Defendant admits the allegations in the first sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

242. Defendant denies that out of seventeen judges currently sitting on the Texas Court of Criminal Appeals and the Texas Supreme Court, none are Hispanic or Black. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

243. Defendant admits the allegations in this paragraph.

244. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

245. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

246. Defendant admits the allegations in the second sentence of this paragraph. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

247. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

248. Defendant admits that S.B. 1 violates Section 2 of the Voting Rights Act.

249. Defendant admits the allegations in this paragraph.

250. Defendant admits the allegations in this paragraph.

251. Defendant admits the allegations in this paragraph.

252. Defendant admits the allegations in this paragraph.

253. Defendant admits that Plaintiffs challenge the enumerated provisions of S.B. 1.

254. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

255. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

256. Defendant admits the allegations in this paragraph.

257. Defendant admits the allegations in this paragraph.

258. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

259. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

260. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

261. The allegations in this paragraph consist of legal conclusions that are not subject to admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

262. Defendant admits that S.B.1 violates the First and Fourteenth Amendment of the United States Constitution. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

263. Defendant admits the allegations in this paragraph.

264. Defendant admits the allegations in this paragraph.

265. Defendant admits the allegations in this paragraph.

266. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

267. Defendant admits the allegations in this paragraph.

268. Defendant admits the allegations in this paragraph.

269. Defendant admits the allegations in this paragraph.

270. Defendant admits the allegations in this paragraph.

271. Defendant admits the allegations in this paragraph.

272. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

273. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

274. Defendant admits that S.B. 1 violates the First Amendment to the United States Constitution. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

275. Defendant admits that S.B. 1 violates the First Amendment to the United States Constitution. Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

276. Defendant admits the allegations in this paragraph.

277. Defendant admits the allegations in this paragraph.

278. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

279. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

280. Defendant admits the allegations in this paragraph.

281. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

282. Defendant lacks knowledge or information sufficient to form a belief as to the allegations in this paragraph.

283. Defendant admits that S.B. 1 violates Section 208 of the Voting Rights Act. The remaining allegations in this paragraph consist of legal conclusions that are not subject to

admission or denial. To the extent a further response is required, Defendant lacks knowledge or information sufficient to form a belief as to the remaining allegations in this paragraph.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT,
HARRIS COUNTY ELECTIONS
ADMINISTRATOR, ISABEL
LONGORIA, IN HER INDIVIDUAL
CAPACITY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on October 25, 2021, in compliance with the Federal Rules of Civil Procedure to all parties of record.

/s/ Sameer S. Birring
SAMEER S. BIRRING
ASSISTANT COUNTY ATTORNEY